

At that time, the parties did not request that the Court modify the subsequent deadlines for the LPR 3.1 Final Infringement Contentions, LPR 3.1 Final Unenforceability and Invalidity Contentions, or LPR 3.3 Document Production Accompanying Final Invalidity Contentions. However, the parties did “agree to evaluate and reasonably accommodate additional proposed changes to the case schedule[.]” (D.E. 200 at 2.) Indeed, at the November 28, 2011 hearing, the parties advised the Court that they might seek further modifications to the case schedule, which the Court indicated it would accommodate. Hearing Tr. at 12:8-13:10.

Defendants are currently in the process of supplementing their respective LPR 2.1 Initial Disclosures and, thus, the parties have not completed the events covered by LPR 2.2–2.5. However, because the deadlines for the LPR 3.1 Final Contentions and LPR 3.3 Document Production were not stayed, these deadlines are currently set for January 25, 2012. All parties agree it would not be feasible to submit the LPR 3.1 Final Contentions or the LPR 3.3 Document Production at this time. Furthermore, the LPR clearly contemplate completing LPR 2.2–2.5 before LPR 3.1 and LPR 3.3. Therefore, good cause exists to stay the January 25, 2012 deadlines in the Agreed Scheduling Order until the parties have completed LPR 2.2–2.5 and submitted a revised schedule to the Court.¹

Respectfully submitted,

Dated: January 20, 2012

By: /s/Anthony G. Beasley
Ronald J. Schutz (*pro hac vice*)
Munir R. Meghjee (*pro hac vice*)
Sang Young A. Brodie (*pro hac vice*)
Anthony G. Beasley (*pro hac vice*)
Miles A. Finn (*pro hac vice*)
Seth A. Nielsen (*pro hac vice*)

¹ The parties recognize that other future deadlines in the schedule may need to be adjusted and agree to meet and confer regarding proposing further changes to the schedule.

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.

2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, Minnesota 55402
Phone: (612) 349-8500
Facsimile: (612) 339-4181

-and-

Patrick G. Burns (ARDC No. 3122589)
Justin R. Gaudio (ARDC No. 6296562)
Gavin James O'Keefe (ARDC No. 6293489)

GREER, BURNS & CRAIN, LTD.

300 South Wacker Drive
Suite 2500
Chicago, Illinois 60606
Phone: (312) 360-0080
Facsimile: (312) 360-9315

Attorneys for Plaintiffs Edge Capture L.L.C. and Edge Specialists, L.L.C.

Dated: January 20, 2012

By: /s/ Robert Unikel

Robert Unikel
Deanna L. Keysor
Michelle K. Marek
KAYE SCHOLER L.L.P.
3 First National Plaza
70 West Madison Street
Suite 4100
Chicago, IL 60602-4231
Phone: (312) 583-2300
Facsimile: (312) 583-2360

**Attorneys for Defendants Wolverine Trading, L.L.C.
and Wolverine Execution Services, L.L.C.**

Dated: January 20, 2012

By: /s/ Jeffrey G. Randall

Jeffrey G. Randall
Jeffrey D. Comeau
PAUL HASTINGS LLP
1117 South California Avenue
Palo Alto, California 94304-1106
Phone: (650) 320-1800

Allan M. Soobert
PAUL HASTINGS LLP
875 15th Street, N.W.
Washington, D.C. 20005

Emily Newhouse Dillingham
PAUL HASTINGS LLP
191 North Wacker Drive
Chicago, Illinois 60606
Phone: (312) 499-6292

**Attorneys for Defendants Barclays Bank PLC,
Barclays Capital Inc., UBS AG, UBS Financial
Services Inc., and UBS Securities LLC**

CERTIFICATE OF SERVICE

I, Jeffrey G. Randall, hereby certify that on January 20, 2012 I caused a true and correct copy of the foregoing Joint Motion to Stay the January 25, 2012 Deadlines in the Agreed Scheduling Order, to be served by electronic filing using the CM/ECF system upon:

Patrick G. Burns

pburns@gbclaw.net, docket@gbclaw.net

Jeana R. Lervick

jlervick@gbclaw.net; docket@gbclaw.net

Justin R. Gaudio

jgaudio@gbclaw.net

Gavin James OKeefe

gokeefe@gbclaw.net

Ronald Schutz

rjschutz@rkmc.com

Anthony Beasley

agbeasley@rkmc.com

Munir R. Meghjee

mrmeghjee@rkmc.com, ljlewis@rkmc.com, jkcornelius@rkmc.com

Sang A. Young Brodie

sybrodie@rkmc.com, mjlanson@rkmc.com, mmtachen@rkmc.com

Miles A. Finn

mafinn@rkmc.com

Seth A. Nielsen

sanielsen@rkmc.com

Deanna Keysor

deanna.keysor@kayescholar.com

Michelle K. Marek

michelle.marek@kayescholar.com

Robert W. Unikel

Robert.unikel@kayescholar.com; maondil@kayescholar.com

Dated: January 20, 2012

By: /s/ Jeffrey G. Randall